

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	: GOVERNMENT'S SECOND
	: FORFEITURE BILL OF
	: PARTICULARS
- v. -	: <u>21 U.S.C. § 853</u>
	:
MANUEL GEOVANNY RODRIGUEZ-PEREZ,	:
a/k/a "Manny,"	:
a/k/a "Shorty,"	: S12 10 Cr. 905 (LTS)
a/k/a "Andres Garcia,"	:
JOSE BETANCOURT,	:
KAREEM BURKE,	:
a/k/a "Biggs,"	:
JENNY CASTILLO,	:
MIGUEL CERDA,	:
a/k/a "Manganzon,"	:
ROSEMARY DEJESUS,	:
a/k/a "Rosy,"	:
WILLIAM ALCIBIO DELGADO,	:
a/k/a "Mejor,"	:
EDGAR ENCARNACION-LAFONTAINE,	:
a/k/a "Tapon,"	:
JAVIER FALCON	:
DANIEL FERNANDEZ,	:
ALFONSO GARCIA,	:
a/k/a "Fonse,"	:
a/k/a "Fonz,"	:
KLEVI GUTIERREZ,	:
a/k/a "Black,"	:
EDWING ALBERTO HERRERA,	:
a/k/a "Edwin Alberto Herrera,"	:
a/k/a "Shampoo,"	:
ISIDRO ESMELIN HERRERA,	:
ESTALIN JIMENEZ,	:
a/k/a "Stalin,"	:
a/k/a "Moyi,"	:
RICARDO JIMENEZ-PADILLA,	:
a/k/a "Gordo,"	:
RICHARD JIMENEZ-PEREZ,	:
a/k/a "Milton Delgado,"	:
a/k/a "Javier Ramirez-Santiago,"	:
JULIO CESAR LEONARDO RAMIREZ,	:
FRANCISCO LEONARDO,	:
a/k/a "Chico,"	:
ANDY LOCIER,	:
JIMMY LOPEZ,	:
a/k/a "Chuck,"	:
LUIS ANTONIO LUCIANO,	:

a/k/a "Louis Luciano,"	
a/k/a "Lucky,"	:
MICHAEL MARTINEZ,	
a/k/a "Miguel Doleo,"	:
ROBERT MARTINEZ,	
ABEL MATOS,	:
a/k/a "Viejo,"	:
NELSON AUGUSTO MATOS,	:
IDAEL MENA-HERNANDEZ,	
a/k/a "Fidel,"	:
ARTURO MENA-SIFONTE,	:
a/k/a "La Vieja,"	:
ERICK FULGENICO NUNEZ,	
a/k/a "Mongolico,"	:
a/k/a "Eddie,"	:
FRANKLIN MANUEL PACHECO-VALDEZ,	:
DEYANIRA PAULINO-GOMEZ,	
a/k/a "Maritza Alvarez-Cruz,"	:
ARIEL PENA,	
a/k/a "Bin,"	:
a/k/a "Vin,"	:
JOSE RAMON PEREZ,	:
LEODIS PEREZ,	
a/k/a "Leodi,"	:
MIRIAM PIMENTEL,	
RICARDO PIMENTEL,	:
a/k/a "Richardo Pimentel,"	:
a/k/a "Zook,"	:
a/k/a "Scarface,"	:
VICTOR QUEZADA,	:
a/k/a "Jose Hiram Quintero-Callejas,"	:
EMMANUEL RAMIREZ,	:
a/k/a "Titi,"	:
LETICIA RAPOSO,	:
a/k/a "La Rubia,"	:
MICHAEL ANGELO REYES,	:
a/k/a "Kiki,"	:
EDWIN RIVERA,	:
a/k/a "Papote,"	:
JOSE A. RODRIGUEZ,	:
a/k/a "Viejo,"	:
OSCAR RODRIGUEZ,	:
a/k/a "Chang,"	:
a/k/a "Chan,"	:
ANDRES ROJAS,	
a/k/a "Conejo,"	:
JESUS SANCHEZ,	

ADEL SANTANA-ZAMORA, :
a/k/a "Adel Santana," :
MATTHEW SANTIAGO, :
a/k/a "Dirt," :
MATTHEW WOODSTOCK STANG, :
a/k/a "Magazine Guy," :
JEROME SIMPSON, :
a/k/a "Suburban," :
DANIEL VALDEZ, :
OMEL VAZQUEZ-PEREZ, :
a/k/a "Come Pizza," :
a/k/a "Omel," :
CHRISTOPHER VIZCAINO, :
a/k/a "Christopher Viscaino," :
a/k/a "Chuch," :
a/k/a "Pechucho," :
a/k/a "Pechuch," :

Defendants. :

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Pursuant to United States v. Grammatikos, 633 F.2d 1013, 1024 (2d Cir. 1980), the Government respectfully gives notice that the property subject to forfeiture as a result of the commission of the controlled substance offenses described in Count One through Four and Eight of the Indictment, as alleged in

the Forfeiture Allegations, also includes but is not limited to the following:


ALL RIGHT, TITLE AND INTEREST IN REAL PROPERTY AND APPURTENANCES LOCATED IN THE TOWN OF THOMPSON, COUNTY OF SULLIVAN, STATE OF NEW YORK, MORE PARTICULARLY DESCRIBED IN THE SCHEDULE A ATTACHED HERETO.

Dated: New York, New York
November 30, 2010

Respectfully Submitted,

PREET BHARARA
United States Attorney

By:


MICHAEL D. LOCKARD
Assistant United States Attorney
Telephone: (212) 637-2193

File Number: 2389

**SCHEDULE A
PROPERTY DESCRIPTION**

ALL THOSE CERTAIN LOTS, PIECES OR PARCELS OF LAND IN THE TOWN OF THOMPSON, COUNTY OF SULLIVAN, STATE OF NEW YORK, CONSISTING OF LAND CONTAINING 395± ACRES OF LAND ON THE WEST BANK AND TO THE WEST OF NEVERSINK RIVER SHOWN AND DESIGNATED ON THE TAX MAP OF THE TOWN OF THOMPSON AS SECTION 68, BLOCK 1, LOT 1, AND SECTION 68, BLOCK 1, LOT 10 BEING PART OF THE LANDS DESCRIBED IN A CERTAIN DEED TO THE PARTY OF THE FIRST PART AND RECORDED IN THE SULLIVAN COUNTY CLERK'S OFFICE IN LIBER 728 OF DEEDS AT PAGE 1098, AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT ON THE 1200 FOOT CONTOUR LINE AS SHOWN ON THE UNITED STATES DEPARTMENT OF INTERIOR GEOLOGICAL SURVEY MAP OF THE HARTWOOD QUADRANGLE (1966) AS FIXED BY UNITED STATES GEOLOGICAL SURVEY BENCH MARKS WHERE IT IS INTERSECTED BY THE BOUNDARY LINE OF THE TOWNS OF THOMPSON AND FORESTBURGH AND RUNNING THENCE NORTHWESTERLY ALONG SAID TOWN BOUNDARY LINE 7000 ± FEET TO A POINT ON THE DIVISION LINE OF THE HARDENBURGH PATENT AND THE MINISKINK PATENT,

THENCE SOUTHWESTERLY 82 DEGREES, 31 MINUTES EAST 6000 ± FEET THROUGH THE TOWN OF THOMPSON AND ALONG THE SAID DIVISION LINE BETWEEN THE HARDENBURGH PATENT AND THE MINISINK PATENT TO A POINT WHERE SAID DIVISION LINE INTERSECTS THE SAID 1200 FOOT CONTOUR LINE AND THENCE SOUTHWESTERLY ALONG THE SAID 1200 FOOT CONTOUR LINE TO A POINT WHERE THE SAID CONTOUR LINE INTERSECTS THE BOUNDARY LINE BETWEEN THE TOWN OF THOMPSON AND THE TOWN OF FORESTBURGH, BEING THE POINT AND PLACE OF BEGINNING.

File Number: 2389

SCHEDULE A**The foregoing are more particularly bounded and described as follows:**

ALL THOSE CERTAIN LOTS, PIECES OR PARCELS OF LAND IN THE TOWN OF THOMPSON, COUNTY OF SULLIVAN, STATE OF NEW YORK, CONSISTING OF LAND CONTAINING 350.06 ACRES OF LAND ON THE WEST BANK AND TO THE WEST OF NEVERSINK RIVER SHOWN AND DESIGNATED ON THE TAX MAP OF THE TOWN OF THOMPSON AS SECTION 68, BLOCK 1, LOT 1, AND SECTION 68, BLOCK 1, LOT 10 BEING PART OF THE LANDS DESCRIBED IN A CERTAIN DEED TO BENJAMIN WECHSLER AND RECORDED IN THE SULLIVAN COUNTY CLERK'S OFFICE IN LIBER 728 OF DEEDS AT PAGE 1098, AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT A 5/8" IRON ROD CAPPED "RETTEW PC" SET ON THE LINE BETWEEN THE TOWN OF THOMPSON AND THE TOWN OF FORESTBURGH, SAID ROD BEING NORTH 50° 31' 19" WEST 635.45 FEET FROM A 1939 TOWN LINE STONE MONUMENT FOUND IN CONCRETE;

THENCE RUNNING ALONG SAID TOWN LINE AND ALONG THE NORTHERLY LINE OF LANDS NOW OR FORMERLY OF BENJAMIN WECHSLER AS DESCRIBED IN LIBER 1961 OF DEEDS AT PAGE 559, NORTH 50° 31' 19" WEST 8127.58 FEET TO A 5/8" IRON ROD CAPPED "RETTEW PC" SET AT AN ANGLE POINT OF SAID COMMON TOWNSHIP LINE AND NORTHERLY LINE OF THE MINISINK PATENT.

THENCE ALONG THE SOUTHERLY LINE OF LOT 3 IN GREAT LOT 13 OF THE HARDENBURGH PATENT AND THE LANDS NOW OR FORMERLY OF HK HOLDINGS LLC AS DESCRIBED IN LIBER 3147 OF DEEDS AT PAGE 680, SOUTH 83° 00' 55" EAST PASSING OVER A 5/8" IRON ROD CAPPED "RETTEW PC" SET AT 3348.95 FEET FOR A TOTAL DISTANCE OF 3548.95 FEET TO A 5/8" IRON ROD CAPPED "RETTEW PC" SET ON THE NORTHERLY LINE OF LOT 25 OF THE MINISINK PATENT AND THE SOUTHWEST CORNER OF LOT 2 IN GREAT LOT 13 OF THE HARDENBURGH PATENT.

THENCE ALONG THE SOUTHERLY LINE OF LOT 2 AND THE LANDS NOW OR FORMERLY OF HIRIAM JONES CAMP, INC. AS DESCRIBED IN LIBER 559 OF DEEDS AT PAGE 536 AND ALSO A PARCEL DESCRIBED IN LIBER 744 OF DEEDS AT PAGE 102, SOUTH 83° 00' 55" EAST 3530.01 FEET TO A 5/8" IRON ROD FOUND IN A PILE OF STONES ON AN ERRATIC AT THE SOUTHEAST CORNER OF THE AFOREMENTIONED LOT 2, BEING A SOUTHWEST CORNER OF LANDS NOW OR FORMERLY OF THE PEOPLE OF THE STATE OF NEW YORK AS DESCRIBED IN LIBER 2489 OF DEEDS AT PAGE 223.

THENCE ALONG SAID LANDS OF THE STATE OF NEW YORK, SOUTH 83° 00' 55" EAST 38.19 FEET TO A POINT ON THE LINE OF THE LANDS OF THE PEOPLE OF THE STATE OF NEW YORK AS DESCRIBED IN LIBER 1025 OF DEED AT PAGE 196, BEING A POINT ON THE 1200 FOOT CONTOUR LINE AS SHOWN ON A NYS DEPARTMENT OF ENVIRONMENTAL CONSERVATION MAP NO. 10,767 ENTITLED "NEVERSINK RIVER UNIQUE AREA"

THENCE SOUTHWESTERLY ALONG THE SAID 1200 FOOT CONTOUR LINE THE FOLLOWING 23 COURSES AND DISTANCES;

1. SOUTH 19° 24' 11" EAST, 250.18 FEET TO A PILE OF STONES;
2. SOUTH 16° 44' 19" WEST, 206.37 FEET TO A PILE OF STONES;
3. SOUTH 11° 01' 24" WEST, 294.23 FEET TO A PILE OF STONES;

CONTINUED

4. SOUTH 28° 56' 16" WEST, 284.70 FEET TO A PILE OF STONES;
 5. SOUTH 05° 26' 09" EAST, 156.19 FEET TO A STONE ON END IN A PILE OF STONES;
 6. SOUTH 24° 38' 30" WEST, 486.66 FEET TO A POINT;
 7. SOUTH 42° 45' 10" EAST, 105.97 FEET TO A SPIKE FOUND FLUSH IN A PILE OF STONES;
 8. SOUTH 03° 28' 15" WEST, 53.22 FEET TO A PILE OF STONES;
 9. SOUTH 40° 44' 45" WEST, 253.54 FEET TO A STONE ON END IN A PILE OF STONES;
 10. SOUTH 18° 39' 01" EAST, 240.00 FEET TO A PILE OF STONES;
 11. SOUTH 24° 08' 56" EAST, 197.16 FEET TO A STONE ON END IN A PILE OF STONES;
 12. SOUTH 16° 23' 23" EAST, 150.92 FEET TO A STONE ON END IN A PILE OF STONES;
 13. SOUTH 74° 46' 27" WEST 148.21 FEET TO A PILE OF STONES;
 14. SOUTH 45° 27' 46" WEST, 267.88 FEET TO A PILE OF STONES;
 15. SOUTH 53° 23' 51" WEST, 202.50 FEET TO A PILE OF STONES;
 16. SOUTH 49° 14' 21" WEST, 227.98 FEET TO A PILE OF STONES;
 17. SOUTH 07° 27' 43" WEST, 266.47 FEET TO A STONE ON END IN A PILE OF STONES;
 18. SOUTH 02° 06' 38" EAST, 261.49 FEET TO A STONE ON END IN A PILE OF STONES;
 19. SOUTH 25° 01' 53" EAST, 220.16 FEET TO A PILE OF STONES;
 20. SOUTH 12° 16' 11" WEST, 116.06 FEET TO A PILE OF STONES;
 21. SOUTH 01° 22' 16" WEST, 274.86 FEET TO A STONE ON END IN A PILE OF STONES;
 22. SOUTH 27° 18' 12" EAST, 139.82 FEET TO A PILE OF STONES;
 23. SOUTH 14° 42' 37" EAST, 127.76 FEET TO AN IRON ROD SET WHERE THE SAID CONTOUR LINE INTERSECTS THE BOUNDARY LINE BETWEEN THE TOWN OF THOMPSON AND THE TOWN OF FORESTBURGH, BEING THE POINT AND PLACE OF BEGINNING.

TOGETHER WITH THE BENEFITS OF THE FOLLOWING EASEMENTS, 200 FEET IN WIDTH, RUNNING FROM THE NORTHERLY BOUNDARY LINE OF SAID PREMISES ALONG THE EASTERLY LINE OF LOT 3 OF THE HARDENBURGH PATENT NORTHERLY TO THE SOUTHERLY LINE OF HIRAM JONES ROAD MORE PARTICULARLY DESCRIBED AS FOLLOWS:

EASEMENT PARCEL I

ALL THAT CERTAIN PIECE OR PARCEL OF LAND BEING A SMALL PORTION OF LOT 3 OF GREAT LOT 13 IN THE HARDENBURGH PATENT SITUATE IN THE TOWN OF THOMPSON, COUNTY OF SULLIVAN, STATE OF NEW YORK BEING MORE PARTICULARLY BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A 5/8" IRON ROD CAPPED "RETTEW PC" SET ON THE WESTERLY LINE OF LOT 2 OF GREAT LOT 13 IN THE HARDENBURGH PATENT AT A NORTHEAST CORNER OF LANDS NOW OR FORMERLY OF HK HOLDING, LLC AS DESCRIBED IN LIBER 3147 OF DEEDS AT PAGE 680, SAID ROD BEING NORTH 07° 06' 18" EAST 1584.36 FEET FROM A 5/8" IRON ROD CAPPED "RETTEW PC" SET AT THE SOUTHWEST CORNER OF SAID LOT 2 ON THE NORTHERLY LINE OF LOT 25 OF THE MINISINK PATENT AND RUNS THENCE FROM THE POINT OF BEGINNING ALONG A NORTHERLY LINE OF HK HOLDING, LLC, NORTH 83° 00' 55" WEST 200.00 FEET TO A 5/8" IRON ROD CAPPED "RETTEW PC" SET.

THENCE THROUGH THE LANDS OF THE GRANTOR, PHILIP BARRY ON THE FOLLOWING TWO COURSES AND DISTANCES NAMELY:

1) NORTH 07° 16' 54" EAST 615.64 FEET TO A 5/8" IRON ROD CAPPED "RETTEW PC" SET,
 2) SOUTH 83° 00' 55" EAST 200.00 FEET TO A 5/8" IRON ROD CAPPED "RETTEW PC" SET ON THE WESTERLY LINE OF LOT 2, ALSO BEING ON THE WESTERLY LINE OF LANDS NOW OR FORMERLY OF HIRAM JONES CAMP, INC. AS DESCRIBED IN LIBER 559 OF DEEDS AT PAGE 536.

THENCE ALONG SAID LINE, SOUTH 07° 16' 54" WEST 615.64 FEET TO THE POINT OR PLACE OF BEGINNING.

CONTINUED**EASEMENT PARCEL II**

ALL THAT CERTAIN PIECE OR PARCEL OF LAND BEING A SMALL PORTION OF LOT 3 OF GREAT LOT 13 IN THE HARDENBURGH PATENT SITUATE IN THE TOWN OF THOMPSON, COUNTY OF SULLIVAN, STATE OF NEW YORK BEING MORE PARTICULARLY BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A 5/8" IRON ROD CAPPED "RETTEW PC" SET AT THE SOUTHWEST CORNER OF LOT 2 OF GREAT LOT 13 IN THE HARDENBURGH PATENT ON THE NORTHERLY LINE OF LOT 25 IN THE MINISINK PATENT, THENCE ALONG SAID PATENT LINE ALSO BEING THE SOUTHERLY LINE OF LOT 3, NORTH 83° 00' 55" WEST 200.00 FEET TO A 5/8" IRON ROD CAPPED "RETTEW PC" SET.

THENCE THROUGH THE LANDS OF THE GRANTOR, HK HOLDING, LLC AS DESCRIBED IN LIBER 3147 OF DEEDS AT PAGE 680, NORTH 07° 16' 54" EAST 1584.36 FEET TO A 5/8" IRON ROD CAPPED "RETTEW PC" SET ON THE SOUTHERLY LINE OF LANDS NOW OR FORMERLY OF PHILIP BARRY, LLC AS DESCRIBED IN LIBER 2089 OF DEEDS AT PAGE 453 BEING PARCEL 1.

THENCE ALONG SAID LINE OF PHILIP BARRY, LLC, SOUTH 83° 00' 55" EAST 200.00 FEET TO A 5/8" IRON ROD CAPPED "RETTEW PC" SET ON THE WESTERLY LINE OF LOT 2.

THENCE ALONG THE WESTERLY LINE OF LOT 2 ALSO ALONG THE WESTERLY LINE OF LANDS NOW OR FORMERLY OF HIRAM JONES CAMP, INC. AS DESCRIBED IN LIBER 559 OF DEEDS AT PAGE 536, SOUTH 07° 16' 54" WEST 1584.36 FEET TO THE POINT OR PLACE OF BEGINNING.

OVERALL EASEMENT PARCEL DESCRIPTION

ALL THAT CERTAIN PIECE OR PARCEL OF LAND BEING A SMALL PORTION OF LOT 3 OF GREAT LOT 13 IN THE HARDENBURGH PATENT SITUATE IN THE TOWN OF THOMPSON, COUNTY OF SULLIVAN, STATE OF NEW YORK BEING MORE PARTICULARLY BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A 5/8" IRON ROD CAPPED "RETTEW P.C." SET AT THE SOUTHWEST CORNER OF LOT 2 OF GREAT LOT 13 IN THE HARDENBURGH PATENT ON THE NORTHERLY LINE OF LOT 25 IN THE MINISINK PATENT, SAID ROD BEING NORTH 83° 00' 55" WEST 3530.02 FEET FROM A 5/8" IRON ROD FOUND IN A PILE OF STONES ON A LARGE ERRATIC AT THE SOUTHEAST CORNER OF LOT 2, THENCE ALONG SAID PATENT LINE AND THE SOUTHERLY LINE OF LOT 3, NORTH 83° 00' 55" WEST 200.00 FEET TO A 5/8" IRON ROD CAPPED "RETTEW P.C." SET.

THENCE NORTH 07° 16' 54" EAST 2200.00 FEET TO A 5/8" IRON ROD CAPPED "RETTEW PC" SET.

THENCE SOUTH 83° 00' 55" EAST 200.00 FEET TO A 5/8" IRON ROD CAPPED "RETTEW P.C." SET ON THE EASTERLY LINE OF LOT 3, SAID ROD BEING ON THE WESTERLY LINE OF A PARCEL OF LAND DEDICATED TO THE TOWN OF THOMPSON FOR ROAD IMPROVEMENT PURPOSES RELATING TO HIRAM JONES ROAD.

THENCE ALONG THE EASTERLY LINE OF LOT 3 ALSO BEING THE WESTERLY LINE OF THE LANDS DEDICATED TO THE TOWN OF THOMPSON, SOUTH 07° 16' 54" WEST 226.16 FEET TO A 5/8" IRON ROD CAPPED "RETTEW PC" SET.

THENCE CONTINUING ALONG SAID LOT LINE AND ALONG THE WESTERLY LINE OF LANDS NOW OR FORMERLY OF HIRAM JONES CAMP, INC. AS DESCRIBED IN LIBER 559 OF DEEDS AT PAGE 536, SOUTH 07° 16' 54" WEST 1973.84 TO THE POINT OR PLACE OF BEGINNING.

For Information: District Section 68 Block 1 Lot 1 and 10

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AFFIDAVIT OF SERVICE

Corinne L. Scalogna affirms under penalty of perjury pursuant to 28 U.S.C. §1746 the following:

I am employed with FSA in the Office of Preet Bharara, United States Attorney for the Southern District of New York.

On November 30, 2010, I caused to be served, in the case of U.S. v. Manuel Geovanny Rodriguez-Perez, et al., S12 10 Cr. 905 (LTS), the following document via Clerk's Notice of Electronic Filing upon the attorneys who are Filing Users in this case:

Government's Second Forfeiture Bill of Particulars, dated November 30, 2010

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: November 30, 2010
New York, New York


CORINNE L. SCALOGNA